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Counsel for Industry Canada

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GENERAL MOTORS CORPORATION,

Debtor.

Chapter 11

Case No. 09-50026 (REG)

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF NOTICES, PLEADINGS
AND OTHER DOCUMENTS, AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Industry Canada in the above-referenced case, and pursuant to *inter alia*, Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010 and section 1109(b) of Title 11 of the United States Code, § 101 *et seq.* (the “Bankruptcy Code”), requests that the following names be added to any service list in this case and that all notices given or required to be given in this case and all papers served or required to be served in this case, be given to and served upon:

Christopher F. Graham, Esq.
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PLEASE TAKE FURTHER NOTICE that under section 1109(b) of the Bankruptcy Code, this request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, telegraph, telex, e-mail or otherwise (1) that affects or seeks to affect in any way any rights or interest of any creditor or party-in-interest in this case, including Industry Canada, with respect to: (a) the above-named debtor; (b) property of the estate, or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or other conduct by Industry Canada.

PLEASE TAKE FURTHER NOTICE that Industry Canada intends that neither this Notice of Appearance, Request for Service of Notices, Pleadings and Other Documents, and Reservation of Rights nor any later appearance, claim or suit shall waive (1) its right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (2) its right to trial by jury in any proceeding so triable in this case or any case, controversy or

proceeding relating to this case; (3) its right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, setoffs, or recoupments to which it is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: New York, New York
June 2, 2009

MCKENNA LONG & ALDRIDGE LLP

By: /s/ Christopher F. Graham
Christopher F. Graham

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Counsel for Industry Canada

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Notice of Appearance, Request for Service of Notices, Pleadings and Other Documents, and Reservation of Rights** was served to the persons listed below, via First-Class United States Mail with sufficient postage prepaid as followed:

Stephen H. Karotkin, Esq.
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New York, NY 10153

Counsel for the Debtor

United States Trustee
33 Whitehall Street, 21st Floor
New York, NY 10004
Attention: Diana G. Adams, Esq.

Trustee

Dated: New York, New York
June 2, 2009.

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